

1 Response to Interrogatory No. 11: Plaintiff would direct PSS's attention to the facts as  
2 alleged in Plaintiff's Complaint. Additionally, in deciding not to renew Plaintiff based upon a  
3 perceived and/or actual exercise of her right to freely express herself, Defendants deprived  
4 Plaintiff of rights protected by the CNMI Constitution. Specifically, in so terminating the  
5 employment of Plaintiff because of her perceived and/or actual exercise of her right to free  
6 speech, Defendants have either retaliated against Plaintiff for her constitutionally protected  
7 activity and/or created a work environment where employees fear to exercise their  
8 constitutionally protected rights and must curry personal favor with administrators or risk  
9 losing their jobs and the means by which to support themselves. Additionally, Plaintiff was  
10 deprived of her right to due process as the reasons offered for her termination were pretextual  
11 and the administrative proceeding to review this termination was nothing more than a "rubber  
12 stamp" upon the decision made by Defendant Brewer. Furthermore, as discovery in this matter  
13 is ongoing and both party and fact witness depositions have yet to be conducted, Plaintiff  
14 reserves the right to update this interrogatory, up to and including at trial, as new facts become  
15 known to her.

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19 **Interrogatory No. 12:** State with particularity all facts supporting your contention that  
20 "the conduct of Mr. Brewer and PSS caused Ms. Black severe anxiety that continues to this  
21 date, making her constantly apprehensive and fearful that she will not be able to secure  
22 employment and consequently have no means by which to support herself."

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25 **Response to Interrogatory No. 12:** Plaintiff would direct PSS's attention to the facts as  
26 alleged in Plaintiff's Complaint. Furthermore, the anxiety and stress that her unemployment  
27 caused were of the typical sort that a person would experience when faced with the prospect of

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1 having no means by which to support themselves. Additionally, the loss of her teaching  
2 position and the subsequent efforts by Defendants to ensure that Plaintiff would not be hired as  
3 a classroom teacher within the CNMI caused Plaintiff to leave the CNMI in order that she  
4 would be able to find a position as a classroom teacher and pursue her chosen vocation.  
5 Furthermore, as discovery in this matter is ongoing and both party and fact witness depositions  
6 have yet to be conducted, Plaintiff reserves the right to update this interrogatory, up to and  
7 including at trial, as new facts become known to her.

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10 **Interrogatory No. 13:** State with particularity all facts supporting your contention that  
11 “members of the Hopwood faculty and staff became concerned with the qualifications and  
12 competence of Ms. Beth Nepaial the Vice Principal of Hopwood.”

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14 **Response to Interrogatory No. 13:** Plaintiff would direct PSS’s attention to the facts as  
15 alleged in Plaintiff’s Complaint. Plaintiff would also direct PSS’s attention to the contents of  
16 the “letter of concern” mentioned in Interrogatory No. 8 and the press coverage of this “letter  
17 of concern” as it appeared in the local newspapers and on the local television news in the  
18 CNMI. Furthermore, as discovery in this matter is ongoing and both party and fact witness  
19 depositions have yet to be conducted, Plaintiff reserves the right to update this interrogatory, up  
20 to and including at trial, as new facts become known to her.

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23 **Interrogatory No. 14:** State with particularity all facts supporting your contention that  
24 upon receipt of the “letter of concern,” PSS administration and the Board of Education  
25 “contacted Mr. Brewer and tasked him with investigating these concerns.”

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1 Response to Interrogatory No. 14: Plaintiff would direct PSS's attention to the facts as  
2 alleged in Plaintiff's Complaint. Plaintiff would also direct PSS's attention to the contents of  
3 the "letter of concern" mentioned in Interrogatory No. 8 and the press coverage of this "letter  
4 of concern" as it appeared in the local newspapers and on the local television news in the  
5 CNMI. Finally, Plaintiff would direct PSS's attention to the contents and testimony provided  
6 by various witnesses during the administrative grievance proceeding initiated by Plaintiff to  
7 address her termination. Furthermore, as discovery in this matter is ongoing and both party and  
8 fact witness depositions have yet to be conducted, Plaintiff reserves the right to update this  
9 interrogatory, up to and including at trial, as new facts become known to her.

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12 **Interrogatory No. 15:** Have you ever been involved in any other litigation, either as a  
13 defendant or a plaintiff? If so, state the date, place, and title of such action, the nature of such  
14 action and the result of such action.

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16 **Response to Interrogatory No. 15:** Plaintiff objects to this interrogatory as it is overly broad  
17 and overly burdensome (as it lacks any temporal or geographic limit in its scope), vague (as the  
18 term "litigation" is undefined and capable of more than one interpretation) and does not seek  
19 information admissible at trial or calculated to lead to the discovery of admissible information.  
20 Without waiving the aforementioned objections, Plaintiff has been involved in a legal dispute  
21 with a former landlord that resulted in legal action almost twenty-five (25) years ago.

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34 DOCUMENT REQUEST  
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7 Production Request No. 1: Please produce all medical records, surgical records, mental  
8 illness, and counseling records, including but not limited to records or materials to diagnostic  
9 or treatment tests, procedures, writings, notes or memoranda relating to all of your physical,  
10 medical or mental conditions, illnesses or disabilities, without regard to whether you contend  
11 that such illness or conditions were in any way caused by Defendant PSS or Defendant Brewer.

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18 Response to Document Request No. 1: Plaintiff objects to this request as it does not seek  
19 information admissible at trial or information reasonably likely to lead to the discovery of  
20 information admissible at trial, vague, overly burdensome and grossly invasive into Plaintiff's  
21 private matters unrelated to this lawsuit. Without waiving such objections, Plaintiff does not  
22 retain her medical records, but will sign any reasonable release that will enable PSS to gather  
23 documents relevant to the claims and defenses in this suit provided that a copy of any  
24 documents copied from Plaintiff's medical records and retained by PSS is given to Plaintiff.

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28 Production Request No. 2: Please produce all medical records, surgical records, mental  
illness, and counseling records, including but not limited to records or materials related to  
diagnostic or treatment tests, procedures, writings, notes or memoranda relating to all of your  
physical, medical or mental conditions, illnesses or disabilities, that relate to any illness or  
condition allegedly caused by any act or omission of PSS or its employees.

Response to Document Request No. 2: Plaintiff objects to this request as it does not seek  
information admissible at trial or information reasonably likely to lead to the discovery of

1 information admissible at trial, vague and overly burdensome. Without waiving such  
2 objections, Plaintiff does not retain her medical records, but will sign any reasonable release  
3 that will enable PSS to gather these documents provided that a copy of any documents copied  
4 from Plaintiff's medical records and retained by PSS is given to Plaintiff.  
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6 **Production Request No. 3:** Please produce all documents relating to any work that you have  
7 performed, including but not limited to employment or consultation, for compensation, whether  
8 employed or self-employed, from the period of July 30, 2005 until the present, including but  
9 not limited to receipts, checks, bills and invoices.  
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11 **Response to Document Request No. 3:** Plaintiff objects to this request as it does not seek  
12 information admissible at trial or information reasonably likely to lead to the discovery of  
13 information admissible at trial, vague, overly burdensome and grossly invasive into Plaintiff's  
14 private matters unrelated to this lawsuit. Without waiving such objections, Plaintiff has  
15 conducted a reasonable search of her personal documents and produces what documents she  
16 has been able to locate within her custody and/or control responsive to this request by attaching  
17 them to these responses. Specifically, Plaintiff has provided letters of employment,  
18 employment records, pay records and cancelled checks that related to her employment since  
19 July 30, 2005.  
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21 **Production Request No. 4:** Please produce all documents relating to any work that you have  
22 performed, including employment, consultation or volunteering, whether for compensation or  
23 not, related to teaching, coaching or other work in the field of education. Please include all  
24 documents contained in personnel files of former employers, including but not limited to  
25 performance appraisals or evaluations, any documents related to resignation from employment  
26 or any adverse employment action initiated or taken against you, including letters of reprimand,  
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